

1 Susheel Kirpalani (Pro Hac Vice pending)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 51 Madison Avenue, 22nd Floor
New York, New York 10010
3 Telephone: (212) 849-7000
Facsimile: (212) 849-7100
4 Email: susheelkirpalani@quinnemanuel.com

5 K. John Shaffer (Cal. Bar No. 153729)
Matthew R. Scheck (Cal. Bar. No. 273152)
6 QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
7 Los Angeles, CA 90017
Telephone: (213) 443-3000
8 Facsimile: (213) 443-3100
Email: johnshaffer@quinnemanuel.com
9 matthewscheck@quinnemanuel.com

10 Stephen D. Finestone (Cal. Bar No. 125675)
Jennifer C. Hayes (Cal. Bar No. 197252)
11 FINESTONE HAYES LLP
456 Montgomery Street, 20th Floor
12 San Francisco, California 94104
Telephone: (415) 616-0466
13 Facsimile: (415) 398-2820
Email: sfinestone@fhlawllp.com
14 jhayes@fhlawllp.com

15 *Attorneys for the ResCap Liquidating Trust*

16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN JOSE DIVISION**

19)	Case No. 19-51455 (MEH)
20	In re:)	
)	Chapter 11
21	HOME LOAN CENTER, INC.,)	
)	NOTICE OF HEARING ON MOTION TO
22	Debtor.)	CONVERT CASE TO CHAPTER 7
)	
23)	Date: August 29, 2019
)	Time: 10:30 a.m.
24)	Place: Courtroom 11
)	280 South First Street
25)	San Jose, CA 95113
)	Judge: Hon. M. Elaine Hammond
26)	

1 **TO THE UNITED STATES TRUSTEE, THE DEBTOR, CREDITORS AND ALL OTHER**
2 **PARTIES IN INTEREST:**

3 **PLEASE TAKE NOTICE** that a hearing will be held on August 29, 2019 at 10:30 a.m. in
4 the courtroom of the Hon. M. Elaine Hammond, 280 So. First Street, Courtroom 11, San Jose, CA
5 95113 on the Motion to Convert Case to Chapter 7 (the "Motion") filed by creditor the ResCap
6 Liquidating Trust ("ResCap").

7 The Motion is based upon this Notice and Motion and such other and further evidence and
8 argument to be presented prior to or at the hearing on the Motion. ResCap seeks conversion of this
9 case to chapter 7 for cause pursuant to Bankruptcy Code section 1112(b) on the basis that, among
10 other things: (i) there is a substantial and continuing diminution of the bankruptcy estate; (ii) there
11 is no reasonable likelihood of reorganization; (iii) an independent fiduciary is needed to pursue the
12 bankruptcy estate's claims against insiders; (iv) the chapter 11 filing was not done in good faith; (v)
13 the creditors with the overwhelming majority of claims in the case support conversion; and (vi)
14 conversion is in the best interests of creditors.

15 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Motion must be filed and
16 served no later than August 15, 2019.

17 **PLEASE TAKE FURTHER NOTICE** that any party may request a copy of the Motion
18 and the Declaration of Matthew R. Scheck via an electronic request to:
19 matthewscheck@quinnemanuel.com.

20 Dated: July 31, 2019

/s/ Stephen D. Finestone
Susheel Kirpalani
K. John Shaffer
Matthew R. Scheck
QUINN EMANUEL URQUHART & SULLIVAN,
LLP

Stephen D. Finestone
Jennifer C. Hayes
FINESTONE HAYES LLP

Attorneys for the ResCap Liquidating Trust